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Attorney for Defendants
MIKE STINSON, LINDA STINSON, THE STINSON
2009 GRANTOR RETAINED ANNUITY TRUST,
7HBF NO. 2, LTD., STARTUP CAPITAL
VENTURES, L.P., AND STEPHEN J. SHAPER

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

KIMETRA BRICE, et al

Plaintiffs,

v.

MIKE STINSON, et al,

Defendants.

Case Number: 3:19-cv-01481-WHO

**JOINT STIPULATION TO EXTEND
PLAINTIFFS' TIME TO RESPOND TO
MOTIONS TO DISMISS AND
DEFENDANTS' TIME TO REPLY TO
PLAINTIFFS' OPPOSITIONS AND
RESET HEARING DATE**

Pursuant to Civil Local Rule 6-1(b), Plaintiffs Kimetra Brice, Earl Browne, and Jill Novorot (“Plaintiffs”) and Defendants Mike Stinson, Linda Stinson, The Stinson 2009 Grantor Retained Annuity Trust, 7HBF No. 2, Ltd., LLC, Startup Capital Ventures, L.P., and Stephen J. Shaper (the “Stinson Defendants”), by and through their respective counsel, respectfully stipulate as follows:

WHEREAS,

1. On March 21, 2019, Plaintiffs filed a Complaint against Defendants (Dkt. 1).

2. On December 18, 2019, Defendants Mike Stinson, Linda Stinson, 7HBF No. 2, Ltd., LLC, and Stephen J. Shaper filed a Motion to Dismiss (Dkt. 82).

3. On December 18, 2019, Defendants Linda Stinson and Stephen J. Shaper filed a separate Motion to Dismiss (Dkt. 83), and a corresponding request for judicial notice (Dkt. 84).

4. On December 18, 2019, Defendant The Stinson 2009 Grantor Retained Annuity Trust filed a Motion to Dismiss (Dkt. 85).

5. Plaintiffs’ oppositions to the aforementioned Motions to Dismiss (Dkt. Nos. 82-85) were initially due January 2, 2020.

6. Due to the holidays, the parties stipulated, however, that Plaintiffs would have until January 21, 2020 to respond to the afore-mentioned Motions to Dismiss (Dkt. Nos. 88), which the Court approved on January 3, 2020.

7. In the interim, Plaintiffs and the Stinson Defendants have been engaged in meet and confers regarding discovery matters. In addition, a mediation with, *inter alia*, the Stinson Defendants has been scheduled for February 18, 2020.

8. Given the imminently scheduled mediation, the parties have agreed to continue the February 12, 2020 hearing date on the pending motions to dismiss until April 8, 2020, and further extend the time for Plaintiffs to respond to the various pending Motions to Dismiss (Dkt. Nos. 82-85) until March 11, 2020, with the Stinson Defendants’ replies being due March 25, 2020.

9. In the event the mediation is unsuccessful, Plaintiffs expect additional discovery will be needed to respond to Defendants’ motions to dismiss, which the parties anticipate will

likely be the subject of discovery dispute letters with the Court that may necessitate further extensions.

THEREFORE, IT IS NOW HEREBY STIPULATED AND AGREED, by and between the undersigned, by and through their counsel that:

8. The deadline for Plaintiffs to respond to each of the Stinson Defendants' Motions to Dismiss (Dkt. Nos. 82-85) shall be March 11, 2020.

9. The deadline for the Stinson Defendants to reply to Plaintiffs' oppositions shall be March 25, 2020.

10. The February 12, 2020 hearing date on the pending motions to dismiss is to be vacated.

11. The hearing on the Stinson Defendants' Motions to Dismiss shall be held on April 8, 2020 at 2:00 pm.

Dated: January 17, 2020

Respectfully submitted,

/s/ Maren I. Christensen
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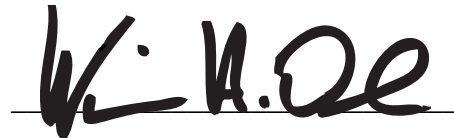
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STARTUP CAPITAL VENTURES, L.P., AND
STEPHEN J. SHAPER

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8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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10 DATED: January 21, 2020

A handwritten signature in black ink, appearing to read "W. H. Orrick", written over a horizontal line.

11 THE HON. WILLIAM H. ORRICK
12 United States District Judge
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/s/ Maren I. Christensen
Maren I. Christensen